

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Linda Ann Glover a/k/a Lynda
Ann Glover**

Debtor(s)

**Headlands Residential Series Owner
Trust, Series A**

Movant

vs.

**Linda Ann Glover a/k/a Lynda Ann
Glover**

Debtor(s)

Ronda J. Winnecour,

Trustee

BK NO. 19-20069 CMB

Chapter 13

Related to Claim No. 7-1

Related Documents: 127, 128

**RESPONSE TO OBJECTION TO
NOTICE OF PAYMENT CHANGE**

Headlands Residential Series Owner trust, Series A, by and through its counsel, KML Law Group, P.C. responds to the Objection to Notice of Payment Change as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied.
5. This is a conclusion of law to which an answer is not required. To the extent an answer is required, denied.
6. Admitted.
7. Admitted.
8. Denied.
9. Denied. The entries on the first section of the escrow analysis are not used for the calculation of the escrow payment.
10. Admitted. The loan was recently service transferred to SN Servicing when it was acquired by Headlands Residential Series Owner Trust, Series A. These entries are part of the boarding process for the set-up of the loan in SN's system of record.
11. Admitted. The loan was recently service transferred to SN Servicing when it was acquired by Headlands Residential Series Owner Trust, Series A. These entries are part of the boarding process for the set-up of the loan in SN's system of record.
12. Denied.
13. Denied. The section of the Escrow Analysis cited by debtor's counsel has no bearing on the escrow payment amount. The escrow payment is calculated off the second section and the anticipated expenditures over the next twelve months. The calculation consists of:

Item	Amount
City/Town Taxes	\$400.09
Force Placed Ins	\$874.08
School Taxes	\$1,272.75

The Total Anticipated Disbursements for 2022 are \$2,546.92. Dividing this amount by 12 provides the monthly escrow component of \$212.24 contained in the escrow analysis. This NOPC does NOT attempt to capture any shortage nor creation of an escrow cushion.

14. Denied.
15. Denied. On July 2, 2021 a request for proof of insurance was sent to debtors. Attached as Exhibit "A" is a true and accurate copy of the letter. On July 20, 2021, after not receiving proof of insurance, a second letter requesting same was sent to debtors. Attached as Exhibit "B" is a true and accurate copy of the letter. On August 20, 2021, after still not receiving proof of insurance, a final letter requesting same was sent to debtors. Attached as Exhibit "C" is a true and accurate copy of the letter. The final letter advised debtors that the approximate cost of the force placed insurance.
16. This is a conclusion of law to which a response is not required. To the extent a response is required, denied. Multiple letters were sent to the debtors asking them to provide proof of hazard insurance on the property. For whatever reason they choose not to submit it. To date, proof of insurance has not been submitted.
17. Denied.
18. Denied.
19. Denied.

WHEREFORE, Secured Creditor, Headlands Residential Series Owner trust, Series A, request that the Objection to Notice of Mortgage Payment Change be overruled.

Dated: 3/31/2022

/s/ Brian C. Nicholas, Esq.

Brian C. Nicholas, Esq.
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-2366
bnicholas@kmlawgroup.com